

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA
HARRISBURG DIVISION**

IN RE:) CASE NO. 1:20-BK-02293-HWV
JOEL LEE REECE AND CAROLYN) CHAPTER 13
SUE REECE)
DEBTORS)

**NOTICE OF APPEARANCE PURSUANT TO BANKRUPTCY RULE 9010 (b) AND
REQUEST FOR NOTICES UNDER BANKRUPTCY RULE 2002 REGARDING
PROPERTY DESCRIBED AS 623 MOHAWK ROAD, NEWVILLE, PA 17241 AND
THAT CERTAIN LOAN MORE SPECIFICALLY IDENTIFIED AS LOAN NUMBER
*****0042**

NOW COMES Freedom Mortgage Corporation, by and through its attorney Brock and Scott, PLLC, pursuant to Bankruptcy Rule 9010 and makes its appearance as a secured creditor in this cause and, pursuant to Bankruptcy Rule 2002, requests that it be noticed on all pleadings, documents and hearings; that it receive copies of all documents; and be added to the matrix to be served at the addresses below:

Mario Hanyon
Brock and Scott, PLLC
Attorneys at Law
302 Fellowship Road, Ste 130
Mount Laurel, NJ 08054
pabkr@brockandscott.com

Freedom Mortgage
10500 Kincaid Drive
Fishers, Indiana 46037

Please take notice that the undersigned hereby appears as counsel for Freedom Mortgage Corporation pursuant to Bankruptcy Rule 9010(b). The undersigned's filing of this notice is limited to the instant case noted above and should not be construed as unlimited representation of the

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Creditor with respect to any and all matters, proceedings, or actions that may be taken in the instant case or any associated case or proceeding involving the above-named Creditor.

RESPECTFULLY SUBMITTED,

/s/ Mario Hanyon

Mario Hanyon
Attorney at Law (203993)
Brock & Scott, PLLC
302 Fellowship Road, Ste 130
Mount Laurel, NJ 08054
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Notice of Appearance has been electronically served or mailed, postage prepaid on June 22, 2021 _____ to the following:

JOEL LEE REECE
623 MOHAWK RD
NEWVILLE, PA 17241-9741

CAROLYN SUE REECE
623 MOHAWK RD
NEWVILLE, PA 17241-9741

Kara Katherine Gendron, Debtor's Attorney
Mott & Gendron Law
125 State Street
Harrisburg, PA 17101
mottgendronecf@gmail.com

Jack N Zaharopoulos, Bankruptcy Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Asst. U.S. Trustee, US Trustee
228 Walnut Street, Suite 1190
Harrisburg, PA 17101

/s/ Mario Hanyon
Mario Hanyon
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